

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

JUN 22 2001

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

Ms. Sandra L. Tirey Assistant Vice President American Chemistry Council 1300 Wilson Boulevard Arlington, VA 22209

Dear Ms. Tirey:

Thank you for your letter of May 22, 2001 in which you summarized the major discussion points of our May 11, 2001 meeting with members of the American Chemistry Council and other industry representatives interested in the pilot of the Voluntary Children's Chemical Evaluation Program (VCCEP). The meeting was extremely helpful to me in understanding any concerns that potential sponsors of chemicals in VCCEP might have as we approach the June 25, 2001 commitment deadline. It is clear that how exposure information is dealt with in VCCEP continues to be a concern to potential sponsors and I would like to do what I can to clarify EPA's views on this issue.

For Tier 1 of VCCEP, which is the initial focus of the pilot, we believe that sponsors should do the best that they can in developing a screening level assessment of readily available exposure information, including, to the extent possible, data on exposures outside the chain of commerce. It is important at Tier 1, to put the totality of exposures into context, so that a judgement can be made as to whether the risks a chemical may pose to children have been adequately characterized and hence whether a chemical should proceed to a higher VCCEP Tier. If chemicals proceed beyond Tier 1, EPA stands ready to assist sponsors in the development of more sophisticated exposure assessments addressing outside the chain of commerce exposures by involving other Federal Agencies and EPA Offices if necessary and by working with the sponsors to engage companies and trade associations associated with important sources of exposure beyond the chain of commerce.

Thank you again for all your help in developing the VCCEP and your continuing support of this initiative. Please feel free to call if you would like to discuss further.

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Stephen L. Johnson

Acting Assistant Administrator